

# STATE OF COLORADO

Bill Owens, Governor  
Jane E. Norton, Executive Director

*Dedicated to protecting and improving the health and environment of the people of Colorado*

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Colorado Department  
of Public Health  
and Environment

June 7, 2002

Mr. Joseph A. Legare, Assistant Manager  
Environment and Stewardship  
U.S. Department of Energy, Rocky Flats Field Office  
10808 Highway 93, Unit A  
Golden, CO 80403-8200



**RE Notification by Rocky Flats Environmental Technology Site (RFETS) to invoke the *Rocky Flats Cleanup Agreement Standard Operating Protocol (RSOP) for Facility Component Removal, Size Reduction, and Decontamination Activities* for Closure of RCRA Tank Units 40 17, 40 18, and 40 19 in Buildings 865 and 866**

Dear Mr. Legare

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division"), has reviewed your February 12, 2002 letter and the accompanying notification package received on February 15, 2002, notifying us of your intent to utilize the *RSOP for Facility Component Removal, Size Reduction, and Decontamination Activities* (the "Component RSOP") for the closure of the remaining portions of interim status RCRA Tank Units 40 17, 40 18, and 40 19 located in Buildings 865 and 866. RCRA Tank Units 40 17, 40 18, and 40 19 are also known as Tanks T-1, T-2, and T-3, respectively. RCRA Tank Units 40 17, 40 18, and 40 19 also include secondary containment structures, ancillary equipment, and piping located in, and connecting the system between Buildings 865 and 866. The Division prepared and e-mailed comments on or about February 25, 2002 regarding this RSOP notification package for closure of these RCRA tank units. As documented in the attached contact record, a discussion was held on May 9, 2002 between Kim Myers of Kaiser-Hill and James Hindman of the Division and the Division's comments were resolved during the discussion. Additionally, it was agreed during this May 9, 2002 discussion that since decontamination had been attempted for these tanks and ancillary equipment, they could be characterized and disposed of as non-hazardous waste based on analytical results.

We hereby formally agree that the appropriate activities described in the notification may proceed utilizing the Component RSOP, with the following conditions:

1. Sump 145A in B865 must be closed as documented in the May 9, 2002 contact record between Kim Myers of Kaiser-Hill and James Hindman of the Division. For any other concrete secondary containment structures associated with these RCRA Tank Units, the application of Clean Closure Option #3 under Section 5.1.1 of the Component RSOP will require either
  - a. a demonstration that an impermeable coating was maintained in good condition on the concrete secondary containment throughout the life of the unit, or
  - b. verification sampling and analysis of the remaining concrete for hazardous waste constituents that were managed within RCRA Tank Units 40 17, 40 18, and 40 19.

ADMIN RECORD

B865-A-000036

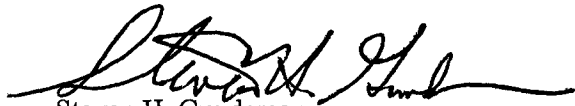
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- 2 It will be necessary to thoroughly evaluate the secondary containment in Buildings 865 and 866 for potential pathways (e g , cracks, seams, etc ) for migration of contamination to the underlying soils The results of this evaluation and the closure verification analysis of the remaining concrete (see condition #1 above) will need to be considered in determining whether or not additional soil sampling will be necessary
- 3 It is stated in your letter that, "This work will be conducted in accordance with the work control documentation prepared by the subcontractor." The utilization of the approved Component RSOP includes the implementation of the work control process as provided therein As such, the subcontractor's work control process must adhere to that described in the Component RSOP, or it must be shown to be equivalent Any variation from the work control process as described and approved in the Component RSOP must be identified and appropriate rationale provided for our approval
- 4 Work control documentation for the closure activities of RCRA Tank Units 40 17, 40 18, and 40 19 must describe precautions that will be taken during dismantlement of the units to prevent the release of any residual liquids that may remain in the units The work control documentation must also describe how any residual liquids encountered will be properly characterized and subsequently managed
- 5 As described in the May 9, 2002 contact record between Kim Myers of Kaiser-Hill and James Hindman of the Division, the sump in Building 866 and anything in the sump below the metal plate/cover will be removed and properly characterized as LLM waste, unless further information is discovered that documents the RCRA closure of this sump
- 6 In order for the Division to accept the complete or partial closure of any unit or portion thereof that remains after closure, a certification of closure must be submitted to the Division The certification of closure will need to be signed by the facility and by an independent Colorado registered professional engineer (P E ) in accordance with the requirements of the approved Closure Plan and Section 264 115 of the Colorado Hazardous Waste Regulations (6 CCR 1007-3) The certification of closure may be submitted for either a partial closure of a unit or when an entire unit has been completely closed Regardless of when the certification of closure is prepared and submitted, it is expected that the certifying P E will be involved in the closure process to the extent necessary to adequately certify closure

As indicated in your letter, the consultative process must be utilized to keep us informed of the decommissioning strategy, planning, and activities for this project If you have any questions regarding this correspondence, please contact me at (303) 692-3367 or James Hindman at (303) 692-3345

Sincerely,



Steven H Gunderson  
RFCA Project Coordinator

Attachment

cc S MacLeod, DOE-RFFO  
S Tower, DOE-RFFO  
T Rehder, EPA  
K Dorr, K-H  
F Gibbs, K-H RISS  
K Kehler, K-H RISS

S Nesta, K-H RISS  
A Rosenman, K-H  
D Shelton, K-H  
D Miller, AGO  
D Kruckek, CDPHE

~~Administrative Record Building T-120C~~

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